



1320 19th Street, N.W., Suite 601  
Washington, DC, 20036

2000 Duke Street, Suite 300  
Alexandria, VA 22314

**Evgenia V. Sorokina**

Tel: 240.481.8946

Fax: 703.747.5862

Email: esorokina@ostermcbride.com

**June 11, 2021**

**VIA CM/ECF**

Honorable Vincent L. Briccetti  
United States District Judge  
United States District Court for the Southern District of New York  
300 Quarropas Street, Room 630  
White Plains NY 10601

**RE: *Charon Coins, LLC v. Sonea Griffiths*, No. 7:21-cv-2777  
Motion for Leave to Serve *Subpoena Duces Tecum***

Honorable Judge Briccetti,

Plaintiff Charon Coins, LLC, (“Charon”), respectfully requests the Court grant leave to serve a *subpoena duces tecum* on BMO Harris Bank, N.A. (“BMO”). This case arises out of Plaintiff’s selling \$258,000 of Bitcoin to Defendant Sonea Griffiths. Although Ms. Griffiths initially made payment, Charon’s agent’s bank, BMO claimed to receive a “fraud affidavit.” As a result, BMO froze the account and returned the purchase money to Ms. Griffiths. Although Ms. Griffiths admitted having received the Bitcoin, she has refused to repay the purchase price. She has also refused to return the Bitcoin. Charon believes Ms. Griffiths sent the “fraud affidavit” on which BMO relied in returning her payment. Because Bitcoin is easily transferred and unrecoverable, Charon has a pending motion for attachment and/or a preliminary injunction ordering Ms. Griffiths’ bank account frozen or that she be enjoined from transferring the Bitcoin. Charon seeks leave to obtain a copy of the “fraud affidavit” from BMO, in order to determine if Ms. Griffiths intended to work a fraud on Charon.

Respectfully submitted,  
/s/  
Evgenia V. Sorokina  
N.Y. Bar No. 4607479

Counsel to Plaintiff Charon Coins, LLC

**Admitted in D.C. and N.Y. only**

**CERTIFICATE OF SERVICE**

This will certify the attached Letter Motion was served by first-class mail, postage prepaid, to the defendant, Sonea Griffiths at her residence:

Sonea Griffiths  
151 Park Avenue  
Mt. Vernon, NY 10550  
[Soneasing@gmail.com](mailto:Soneasing@gmail.com)

June 11, 2021

*/s/ Steven M. Oster*  
Steven M. Oster